

Atty. Dkt. No. 10018225-1

REMARKS

This Reply is in response to the Office Action mailed on June 7, 2006 in which claims 1-8, 10-16, 18, 19, 22-24, 26-34, 36-38, 40-42, 44, 45 and 47-49 were rejected. With this response, claims 14, 16, 27, 42, 48 and 49 are canceled; claims 13, 15, 26 and 47 are amended; and claims 50-61 are added. Claims 1-8, 10-13, 15, 18, 19, 22-24, 26, 28-34, 36-38, 40-41, 44, 45, 47 and 50-61 are presented for reconsideration and allowance.

I. Rejection of Claims 1, 2, 5-7, 10-16, 18, 19, 22-24, 26-34, 36-38, 40-42, 44, 45, 47-49 under 35 USC 102(b) based upon Rezanka

Paragraph 2 of the Office Action rejected claims 1, 2, 5-7, 10-16, 18, 19, 22-24, 26-34, 36-38, 40-42, 44, 45, 47-49 under 35 USC 102(b) as being anticipated by Rezanka U. S. Patent 5,570,118. Claims 14, 16, 27, 42, 48 and 49 are canceled. Claims 1-2, 5-7, 10-13, 15, 18, 19, 22-24, 26, 28-34, 36-38, 40-41, 44, 45, 47 and 50-61, as amended, overcome the rejection based upon Rezanka.

A. Claim 1

Claim 1 recites a printing system which includes a first set of printbar assemblies configured to transfer a first percentage of an imaging medium onto a first side of the print media and a second set of printbar assemblies configured to transfer a second percentage of the imaging medium onto the first side of the print media.

Rezanka fails to disclose a printing system having first and second sets of printbar assemblies configured to transfer percentages of imaging medium onto the same side of the print media. In contrast, Rezanka merely discloses cartridge 12 and cartridge 14, wherein cartridge 14 includes multiple ink supply chambers. In rejecting claim 1, the Office Action asserts that Rezanka discloses a first set of printbar assemblies and refers to figure 1, element K1 of Rezanka in support of this assertion. However, as one of ordinary skill in the art knows, the plain meaning of the term "set" is more than one. A single ink chamber K1 does not constitute a set of printbar

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assemblies. The specification clearly indicates that a printbar assembly includes print modules. The specification further indicates that a print module is commonly referred to as a cartridge or pen. Therefore, the single cartridge 12 having a single ink compartment K1 cannot constitute a "set" of printbar assemblies given the plain meaning of the terms "set" and the plain meaning of the term "printbar assembly". Such plain meanings are further supported by the context provided in the present application. Accordingly, the rejection of claim 1 based upon Rezanka should be withdrawn. Claims 2-8, 10 and 12 depend from claim 1 and overcome the rejection for the same reasons.

B. Claim 2

Claim 2 depends from claim 1 and further recites that the first set of printbar assemblies transfers the first half of the imaging medium to form a first portion of the printed image while the second set of printbar assemblies transfers the second half of the imaging medium to form a second portion of the printed image.

Rezanka fails to disclose a first PrintBar assembly that transfers a first half of imaging medium and a second earned bar simile that transfers a second-half of the imaging medium. Nowhere does Rezanka disclose what percentages of imaging medium or ink are transferred by cartridges 12 and 14. Moreover, in rejecting claim 2, the Office Action merely refers to Figure 1 of Rezanka in support of its rejection. Figure 1 clearly does not illustrate what percentage of ink or imaging medium is transferred by either cartridge 12 or cartridge 14. In fact, the Office Action has failed to establish even a prima facie case of anticipation of claim 2 based upon Rezanka. Thus, the rejection of claim 2 is improper and should be withdrawn for this additional reason.

C. Claim 13

Claim 13, as amended, recites a printing system which includes print units configured to transfer imaging medium onto a same side of a medium and a heater configured to remove

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moisture from the imaging medium as the medium passes between the print units. Claim 13 further recites that the print units are configured to transfer same colored chromatic imaging medium to the medium. Support for this amendment is found in at least Figure 7 of the present application which illustrates same colored chromatic imaging mediums cyan, magenta and yellow transferred to a medium by different print units 702, 704. Accordingly, no new matter is believed to be added.

Rezanka fails to disclose or suggest print units which transfer same colored chromatic imaging medium to the medium. In contrast, Rezanka merely discloses cartridge 14 which includes cyan, magenta and yellow ink. However, print cartridge 12 does not include any chromatic inks, but merely includes black. Accordingly, claim 13, as amended, overcomes rejection based on Rezanka. Claims 15 and 22-23 depend from claim 13 and overcome the rejection for the same reasons.

D. Claim 26

Claim 26 is amended to incorporate the limitations of former dependent claim 27 which is now canceled. Claim 26, as amended, recites a method wherein the percentage of imaging medium transferred onto the print media with one or more printbar assemblies correspond to the number of print units.

Rezanka fails to disclose a method wherein the percentage of image medium transferred onto a print media with one or more printbar assemblies by a print unit corresponds to the number of print units. Nowhere does Rezanka even mention what percentage of imaging medium is applied by cartridges 12 and 14. Nowhere does Rezanka disclose that the percentage corresponds to the number of print units. The Office Action, in rejecting former claim 27, fails establish even a prima facie case of anticipation in that it fails to even assert that Rezanka discloses applying percentages of imaging medium by print units, wherein the percentages correspond to the number of print units. Accordingly, claim 26 overcomes rejection based upon

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Rezanka. Claims 28-34 and 36-38 depend from claim 26 and overcome the rejection for the same reasons.

E. Claim 40

Claim 40, as amended, recites a method which includes depositing ink onto a print media with multiple print units, wherein depositing includes depositing ink with one or more printbar assemblies ticker print unit, at least one or more printbar assemblies having a same chromatic colored ink.

Rezanka fails to disclose or suggest print units which transfer same colored chromatic imaging medium to the medium. In contrast, Rezanka merely discloses cartridge 14 which includes cyan, magenta and yellow ink. However, print cartridge 12 does not include any chromatic inks, but merely includes black. Accordingly, claim 40, as amended, overcomes the rejection based on Rezanka. Claims 41, 44 and 45 depend from claim 40 and overcome the rejection for the same reasons.

F. Claim 47

Claim 47, as amended, recites one of more computer-readable media comprising computer executable instructions that, when executed, direct a printing device to perform a method comprising transferring multiple percentages of an imaging medium onto a print media to form corresponding multiple portions of the printed image and drying the imaging medium with multiple heaters, and individual heater corresponding to an individual print unit, wherein print units transfer same colored chromatic imaging medium.

Rezanka fails to disclose or suggest print units which transfer same colored chromatic imaging medium to the medium. In contrast, Rezanka merely discloses cartridge 14 which includes cyan, magenta and yellow ink. However, print cartridge 12 does not include any chromatic inks, but merely includes black. Accordingly, claim 47, as amended, overcomes the rejection based on Rezanka.

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II. Rejection of Claims 3, 4 and 8 under 35 USC 103(a) based upon Rezanka

Paragraph 3 of the Office Action rejected claims 3, 4 and 8 under 35 USC 103(a) as being untenable over Rezanka U. S. Patent 5,570,118. For the reasons which follow, Applicants respectfully request that the rejections be withdrawn.

Claims 3, 4 and 8 depend from claim 1 and overcome the rejection based on Rezanka for the same reasons discussed above with respect to claim 1. Claims 3, 4 and 8 depend from claim 1 and further recite at least one other set of printbar assemblies. As noted above with respect to claim 1, Rezanka fails even disclose to sets of printbar assemblies. Rezanka clearly does not disclose get an additional set of printbar assemblies.

In rejecting such claims, the Office Action asserts that:

It would have been obvious to one having ordinary skill in the art at the time the invention was made to have a set of PrintBar assemblies in order to print multiple colors therefore to obtain different print image and increase printing speed.

(Office Action, p. 6). However, the Office Action fails to provide where this alleged motivation is provided in Rezanka. Moreover, this alleged motivation lacks merit. Rezanka already discloses cartridges 12 and 14 which provide each of the primary colors cyan, magenta and yellow, already enabling multiple colors to be printed. Rezanka provides no motivation or suggestion for providing another set of printbar assemblies since each of the colors of ink desired to be printed is already provided by cartridges 12 and 14 and since Rezanka fails to recognize any benefit of providing redundant cartridges providing redundant inks. Accordingly, the rejection of claims 3, 4 and 8 based on Rezanka is improper and should be withdrawn.

III. Added Claims

With this response, claims 50-61 are added. Claims 50-61 recite additional features which further patentably distinguish such claims over the prior art of record.

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A. Claims 50 and 51

Claim 50 depend from claim one and recites that the first set of printbar assemblies spanning with of the print media. Claim 51 depends from claim 50 recites that the first printbar assembly includes multiple print heads that partially overlap one another. Support for added claims 50 and 51 is found at least at page 11, line 10-page 12, line 10. Accordingly, no new matter is believed to be added.

Neither Rezanka nor the prior art of record disclose or suggest the printing system of claim 1 wherein the first set of printbar assemblies span the width of the media or wherein the printbar assembly includes multiple print heads which partially overlap one another. For example, as clearly illustrated in Figure 2 of Rezanka, cartridges 12 and 14 do not span the width of sheet S, but instead have to be scanned across the sheet along carriage rod 18. Thus, added claims 50 and 51 are presented for consideration and allowance.

B. Claims 52-57

Claims 52-57 depend from claim 1 and recite that the first set of printbar assemblies and the second set of printbar assemblies are configured to transfer the same colors of imaging medium. For example, claims 52-55 and 57 recites that the first set of printbar assemblies and that the second set of printbar assemblies transfer the same chromatic colors of imaging medium. Claim 56 recites that the first set of printbar assemblies and that the second set of PrintBar assemblies transfer identical black imaging medium onto the print medium.

Neither Rezanka nor the prior art of record discloses sets of printbar assemblies that transfer the same chromatic color or colors of imaging medium or that transfer identical black imaging medium onto the print medium. For example, cartridge 12 does not transfer any chromatic imaging medium. Even though cartridges 12 and 14 both deposit black inks, inks K1 and K2 are not identical. Accordingly, added claims 52-57 are presented for consideration and allowance.

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C. Claim 58

Claim 58 depend from claim 57 and for the recites that the same chromatic colors of imaging medium have different densities. Neither Rezanka nor are the prior art of record disclose such sets of printbar assemblies dissents in the same chromatic colors and having different densities. Accordingly, claim 58 is presented for consideration and allowance.

D. Claim 59

Claim 59 depends from claim 1 and further recites that the first set of printbar assemblies includes a first printbar and a second printbar, the second printbar located downstream from the first printbar in a media feed direction. Support for added claim 59 may be found in at least Figure 7. Accordingly, no new matter is believed to be added.

The prior art of record, including Rezanka, fails to disclose the system of claim 1 having the arrangement of printbars as recited in claim 59. Even assuming, arguendo, that cartridge 14 could be characterized as having a set of printbar assemblies, the ink compartments for C, M, Y and K2 are not arranged downstream from one another in a media feed direction P. Thus, added claim 59 is presented for consideration and allowance.

E. Claims 60 and 61

Claim 60 depends from claim 1 and further recites that at least one of the first set of printbar assemblies and the second set of printbar assemblies is configured to transfer a fixer to the print medium.

Claims 61 constitutes former dependent claim 16 rewritten in independent form including all of the limitations of former base claim 13. Claim 61 recites a printing system having print units, where at least one of the print units is configured to transfer fixer to the medium.

The prior art of record fails to disclose the printing system of either claims 60 or claim 61. In rejecting former claim 16, which is now rewritten in independent form as added claim 61,

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the Office Action failed to even assert where Rezanka allegedly discloses a print unit configured to transfer a fixer to the medium. In fact, nowhere does Rezanka disclose a print unit configured to transfer fixer to the medium. Accordingly, added claims 60 and 61 are presented for consideration and allowance. Applicants further respectfully note that any rejection of claim 61 based upon new art would constitute a new ground of rejection not necessitated by an amendment by Applicants.

IV. Conclusion

Upon entry of the amendments to the claims as set forth above, claims 1-8, 10-13, 15, 18, 19, 22-24, 26, 28-34, 36-38, 40-41, 44, 45, 47 and 50-61 are now pending in this application.

Applicants believe that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 08-2025. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 08-2025. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 08-2025.

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Respectfully submitted,

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